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November 11, 2021
10253-1

Matter No. 10253-1
Chapter 13
Bill No. 3004

Fees:			Hours	
03/05/21	WDS	Meeting with client to learn of issues facing him, explain process and determine best course of action; following meeting reviewed material, outlined issues, reviewed Montco dockets; notes to file and contacted Tadross Law.	1.29	\$387.00
03/10/21	CH	Organize file, draft representation letters to opposing counsel. Docket Montco and Phila Docket search	1.39	\$111.20
03/15/21	WDS	Reading of client provided documents and law suits; notes made to file; telephone conference with Robin Mayer to discuss aspects of case; email to client to move matter forward; tickle for receipt of documents from client.	1.12	\$336.00
03/24/21	CH	Download and organize file	0.70	\$56.00
04/13/21	WDS	Reading and consideration of client papers; notice of sheriff sale; consideration of information provided and that which was not provided for giving drafting instructions to staff; notes to file.	0.74	\$222.00
04/15/21	CH	Draft petition, run epraisal, KBB, credit reports for him and his wife (includes	4.16	\$332.80

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		bestcase support). Call client schedule appt. Email client with list of documents needed.		
04/15/21	WDS	Conference with paralegal on client documents which are yet need for drafting of petition.	0.19	\$57.00
04/15/21	WDS	Review and updating of draft of client petition.	1.00	\$300.00
04/16/21	WDS	Meeting with client to review facts of case, petition, discuss trustee amount per mortgage arrears and means test; petition signed.	1.65	\$495.00
04/19/21	WDS	Means test analysis and computations; plan revisions drafted.	0.81	\$243.00
04/21/21	WDS	Made final revisions to client's entire petition for filing.	1.13	\$339.00
04/21/21	CH	Revise petition	1.01	\$80.80
04/22/21	WDS	Reviewed final updates and draft of petition; corrections made; approved for filing.	0.40	\$120.00
04/23/21	WDS	Meeting with client to review means test and provide directive as to trustee and mortgage payments timing post-filing and monthly thereafter.	0.15	\$45.00
04/23/21	CH	File petition, draft sheriff letter. Download filed petition and email filing notice to sheriff and counsel. Draft client letter, mortgage & trustee ltrs	0.90	\$72.00
04/26/21	CH	Contact PA Dept of Rev re: business taxes status.	0.25	\$20.00
04/28/21	CH	Call Midland mortgage for post-pet payment amount and mailing info	0.17	\$13.60
05/05/21	CH	Contact mortgage company for post-petition payments again	0.55	\$44.00

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05/06/21	CH	Call KML LawGroup re mortgage, email client for 341 docs, draft and file suggestions of bankruptcy	1.52	\$121.60
05/07/21	CH	Call to/from opposing counsel re: post-pet payments. draft letter and email client. Call client follow-up to emails	0.29	\$23.20
05/11/21	WDS	Follow up email to client to encourage delivery of first mortgage and trustee payments and 341 documents.	0.10	\$30.00
05/18/21	WDS	Follow up letter of request and acknowledgment from client concerning trustee and mortgage payments and documents necessary for 341 meeting.	0.13	\$39.00
05/21/21	WDS	Telephone conference with Rutu Patel, daughter of a creditor requesting a copy of plan and creditor schedule.	0.10	\$30.00
05/25/21	WDS	Responded to email request for documents from Patel's daughter; read and addressed developing issue that client is not providing legible and timely documents for 341 meeting.	0.24	\$72.00
05/25/21	CH	Download and review client provided 341 docs. Draft and file PFM, email client	0.53	\$42.40
05/28/21	CH	Download client provided docs. Redact and upload to trustee. Call client schedule pre-341 mtg	0.45	\$36.00
06/02/21	WDS	Preparation for and having pre-341 meeting.	1.20	\$360.00
06/03/21	WDS	Received MidFirst's claim; reviewed same and forwarded to client with explanatory email.	0.18	\$54.00
06/04/21	WDS	Review of claims filed to date; notes to avoid inchoate liens and object to secured claims reducing them to unsecured status; notes to apply for mortgage modification to remove mortgagee arrears from plan;	1.03	\$309.00

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		attended meeting of creditors via Zoom; discussion with client re above matters following meeting.		
06/17/21	CH	Email from/to client re: status on mortgage and trustee payments due	0.31	\$24.80
06/22/21	CH	Draft Reply to MTD.	0.13	\$10.40
06/23/21	CH	Call Midland Mortgage and verify residence occupancy. File Reply to MTD	0.16	\$12.80
06/23/21	WDS	Telephone conference with client re trustee's motion and his and mortgage company arrears must be paid soon.	0.11	\$33.00
07/13/21	WDS	Receipt and review of motion for relief, motion to dismiss; spoke with Clara; no payments to either made; lmtc and tickled for follow up call and email tomorrow.	0.21	\$63.00
07/14/21	WDS	Brief call to client; he is dropping off trustee money in an hour; received full trustee payment and discussed mortgage company's motion for relief and need to bring that current asap.	0.18	\$54.00
07/20/21	CH	Draft reply to Motion for Relief	0.29	\$23.20
07/28/21	CH	Email client re: mortgage payment and file Reply to MFR	0.29	\$23.20
08/05/21	WDS	Telephone conference with Bill McLaughlin re service of nondischargeability complaint; review status of mortgage motion for relief and contact to client re payments; notes to file.	0.35	\$105.00
08/06/21	WDS	Follow up attempt to call client; phone not accepting calls.	0.05	\$15.00
08/09/21	WDS	Received partial mortgage payment, scanned and emailed to counsel proposing a continuance and/or stipulation; communicated to client;	0.28	\$84.00

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		emails exchanged re continuing motion for relief and entering into a stipulation; notified client.		
08/24/21	WDS	Discussion with trustee over actions needed and issues to be resolved prior to confirmation recommendation; accepted service of process of McLaughlin adversary complaint and initiated discussion with counsel; reviewed mortgagee proposed stipulation, made notes of objections, conference with client and emailed counsel to advise of payment in full to be made Sept. 7.	1.31	\$393.00
08/26/21	WDS	Further discussion and negotiations with counsel to settle motion for relief; tickled for follow up.	0.30	\$90.00
08/30/21	WDS	Prepared for negotiations with Bill McLaughlin; lmtc.	0.35	\$105.00
09/10/21	WDS	Text to client requesting status of delivery of promised mortgage check; no response.	0.05	\$15.00
09/13/21	WDS	Follow up inquiry to client re delivery of mortgage check to address motion for relief scheduled for Wednesday; email from counsel as to status; text and then conversation and email with client re some amount of payment is necessary.	0.45	\$135.00
09/14/21	WDS	Response from client re my inquiry of making some payment amount; email and lmtc counsel; negotiations with counsel; stipulation entered into; signed and delivered stipulation.	0.45	\$135.00
09/21/21	WDS	Letter transmitting payments to mortgage company; texts and letter of advice to client re continuing to pay mortgage payments.	0.30	\$90.00
09/24/21	WDS	Drafting of motions to avoid liens; confirming legal research; amending	1.77	\$531.00

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		plan; draft objections to claims; negotiations with creditor McLaughlin.		
09/24/21	CH	Draft Objection to Claim and Motion to Avoid Lien packages	0.64	\$51.20
09/27/21	WDS	Review and revisions to motion to avoid lien and objection to claim.	0.41	\$123.00
09/28/21	CH	File motion to avoid lien and objection to claim of PPatel	1.20	\$96.00
09/28/21	WDS	Received settlement agreement from McLaughlin re adversarial; email exchange with trustee re amending plan and objections filed; tickled for follow up actions.	0.24	\$72.00
10/13/21	WDS		0.12	\$36.00
10/13/21	CH	Draft Fee App	0.32	\$25.60
10/14/21	WDS	Near final revisions to amending plan; notes to talk to client re revised plan payment at time mortgagee stipulation ends; getting payments here now; list of mtal of Atlantic Insurance and apply for mortgage modification; telephone conference with client these matters and checks being delivered here for transmittal by next Friday; tickled for receipt of payments.	1.17	\$351.00
10/19/21	CH	File cert of no response to Pritam MTAL	0.02	\$1.60
10/25/21	WDS	Telephone conference with client re Andre Agard's criminal complaint; email follow up to mortgagee counsel to have Wednesday's hearing marked concluded.	0.21	\$63.00
10/26/21	WDS	Received confirmation of settlement from counsel; notified court to remove motion from tomorrow's list.	0.05	\$15.00
10/29/21	WDS	Provided order avoiding Patel lien to client along with status of matters email.	0.15	\$45.00

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11/03/21	CH	Draft and mail Midfirst occupancy ltr	0.09	\$7.20
11/10/21	WDS	Preparation for objection to claim hearing and attendance at virtual hearing to have order entered.	0.37	\$111.00
11/11/21	WDS	Revising first amended plan and discussion with client re present arrears, cure thereof and future payments adjustment; tickled for follow up action.	0.90	\$270.00
Hours:			36.61	
Total fees:				\$7,601.60

Expenses:

04/15/21	WDS	S. Coles - Credit Report		\$45.00
04/15/21	WDS	J. Collopy - Credit Report		\$45.00
04/23/21	CH	Ch 13 Filing Fee		\$313.00
Total expenses:				\$403.00

Retainer:

03/05/21	Ck #135 - Retainer		\$500.00
03/18/21	Ck #136 - Retainer		\$1,500.00
04/23/21	Cash - Retainer & Filing Fees		\$2,088.00
11/11/21	Retainer applied		\$4,088.00 CR
Retainer received:			\$4,088.00
Retainer applied:			\$4,088.00 CR

Billing Summary

Previous balance	\$0.00
Payments & adjustments	0.00
New fees	7,601.60
New expenses	403.00
Retainer applied	4,088.00 CR

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Total now due	\$3,916.60
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Retainer balance	\$0.00
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Payment due upon receipt. For your convenience, our firm now accepts debit/credit card payments online. To make a payment, please go to:
<https://secure.lawpay.com/pages/jrlaw/operating>

Thank you for having us represent you.